## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA COURT FILE NO.: 17-CV-02065-MJD-BRT

Bullie Gumani, on behalf of himself and all others similarly situated,

Plaintiff,

v.

Huntington Debt Holdings, LLC, and Central Mediation Services,

Defendants.

MOTION FOR DEFAULT JUDGMENT

Plaintiff hereby moves this Court for an Order under the Federal Rules of Civil Procedure Rule 55(a) and (b) to grant Plaintiff a Default Judgment as to its claims against Defendant 11<sup>th</sup> Hour Recovery LLC under the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et seq.*, state law Invasion of Privacy, wrongful repossession, trespassing, and conversion; based upon the memorandum and affidavits to be filed in accordance with the Local Rules, and oral arguments to be presented at the hearing, and upon all the records, filings, and proceedings herein.

Dated this 8th day of March 2018.

By: s/Mark L. Vavreck

Mark L. Vavreck MN Bar No. 318619 Designer's Guild Building 401 North Third Street, Suite 600

Telephone: 612-59-9500 Facsimile: 612-659-9220 mvavreck@cgmvlaw.com

Minneapolis, MN 55401

Thomas J. Lyons Jr. (#249646) CONSUMER JUSTICE CENTER P.A. 367 Commerce Court Vadnais Heights, Minnesota 55127 Telephone: (651) 770-9707 Facsimile: (651) 704-0907

tommycjc@aol.com

ATTORNEYS FOR PLAINTIFF